

**BROADCAST EQUAL EMPLOYMENT OPPORTUNITY
MODEL PROGRAM REPORT**

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| Legal Name of the Applicant Queen Bee's Knees LLC | | |
| Mailing Address 7025 Raymond Road | | |
| City Madison | State or Country (if foreign address) WI | ZIP Code 53719 |
| Telephone Number (include area code) (608) 271-4321 | E-Mail Address (if available) brian@morganmurphymedia.com | |
| Facility ID Number 27690, 65673 and 65672 | | Call Sign WHKB(FM), WOLV(FM), WCCY(AM) |

☐ Application for Construction Permit for New Station ☒ Application for Assignment of License

☐ Application for Transfer of Control

a. Service Type: ☒ AM ☒ FM ☐ TV ☐ Other (specify) _____

b. Community of License:

| | |
|-------------------------|--------------------|
| City Houghton | State MI |
|-------------------------|--------------------|

INSTRUCTIONS

Applicants seeking authority to construct a new commercial, noncommercial or international broadcast station, applicants seeking authority to obtain assignment of the construction permit or license of such a station, and applicants seeking authority to acquire control of an entity holding such construction permit or license are required to afford equal employment opportunity to all qualified persons and to refrain from discrimination in employment and related benefits on the basis of race, color, religion, national origin or sex. See 47 C.F.R. Section 73.2080. Pursuant to these requirements, an applicant who proposes to employ five or more full-time employees must establish a program designed to assure equal employment opportunity. This is submitted to the Commission as the Model EEO Program. For purposes of this form, a station employment unit is a station or a group of commonly owned stations in the same market that share at least one employee.

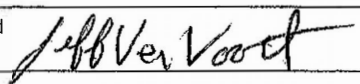
Guidelines for a Model EEO Program and a Model EEO Program are attached.

NOTE: Check appropriate box, sign the certification below and return to FCC:

☐ Station employment unit will employ fewer than 5 full-time employees; therefore no written program is being submitted.

☒ Station employment unit will employ 5 or more full-time employees. Our Model EEO Program is attached. (You must

I certify that the statements made herein are true, complete, and correct to the best of my knowledge and belief, and are made in

| | |
|---|---|
| Signed  | Name of Respondent JEFF Ver Voort |
| Title Director of HR | Date 9-12-2023 |

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

GUIDELINES TO THE MODEL EEO PROGRAM

The model EEO program adopted by the Commission for construction permit applicants, assignees, and transferees contains five sections designed to assist the applicant in establishing an effective EEO program for its station. The specific elements which should be addressed are as follows:

I. GENERAL POLICY

The first section of the program should contain a statement by the applicant that it will afford equal employment opportunity in all personnel actions without regard to race, color, religion, national origin or sex, and that it has adopted an EEO program which is designed to fully utilize the skills of qualified persons.

II. RESPONSIBILITY FOR IMPLEMENTATION

This section calls for the name (if known) and title of the official who will be designated by the applicant to have responsibility for implementing the station's program.

III. POLICY DISSEMINATION

The purpose of this section is to disclose the manner in which the station's EEO policy will be communicated to employees and prospective employees. The applicant's program should indicate whether it: (a) intends to utilize an employment application form which contains a notice informing job applicants that discrimination is prohibited and that persons who believe that they have been discriminated against may notify appropriate governmental agencies; (b) will post a notice which informs job applicants and employees that the applicant is an equal opportunity employer and that they may notify appropriate governmental authorities if they believe that they have been discriminated against; and (c) will seek the cooperation of labor unions, if represented at the station, in the implementation of its EEO program and in the inclusion of nondiscrimination provisions in union contracts. The applicant should also set forth any other methods it proposes to utilize in conveying its EEO policy (e.g., orientation materials, on-air announcements, station newsletter) to employees and prospective employees.

IV. RECRUITMENT

The applicant should specify the recruitment sources and other techniques it proposes to use to attract qualified job applicants. The purpose of the listing is to assist the applicant in developing specialized referral sources to ensure wide dissemination of vacancy information as job opportunities occur. Sources which subsequently prove to be nonproductive should not be relied on and new sources should be sought.

MODEL EQUAL EMPLOYMENT OPPORTUNITY PROGRAM

I. GENERAL POLICY

It will be our policy to provide equal employment opportunity to all qualified individuals without regard to race, color, religion, national origin or sex in all personnel actions including recruitment, evaluation, selection, promotion, compensation, training and termination.

It will also be our policy to promote the realization of equal employment opportunity through a positive, continuing program of specific practices designed to ensure the full realization of equal employment opportunity without regard to race, color, religion, national origin or sex.

To make this policy effective, and to ensure conformance with the Rules and Regulations of the Federal Communications Commission, we have adopted an Equal Employment Opportunity Program which includes the following elements:

II. RESPONSIBILITY FOR IMPLEMENTATION

Name/Title Jeff VerVoort, Director of Human Resources

will be responsible for the administration and implementation of our Equal Employment Opportunity Program. It will also be the responsibility of all persons making employment decisions with respect to the recruitment, evaluation, selection, promotion, compensation, training and termination of employees to ensure that our policy and program is adhered to and that no person is discriminated against in employment because of race, color, religion, national origin or sex.

III. POLICY DISSEMINATION

To ensure that all members of the staff are cognizant of our equal employment opportunity policy and their individual responsibilities in carrying out this policy, the following communication efforts will be made:

☒ The station's employment application forms will contain a notice informing prospective employees that discrimination because of race, color, religion, national origin or sex is prohibited and that they may notify the appropriate local, State or Federal agency if they believe they have been the victims of discrimination.

☒ Appropriate notices will be posted informing applicants and employees that the station is an Equal Opportunity Employer and of their right to notify an appropriate local, State or Federal agency if they believe they have been the victims of discrimination.

☐ We will seek the cooperation of unions, if represented at the station, to help implement our EEO program and all union contracts will contain a nondiscrimination clause.

☒ Other (specify)

The broadcast stations in this employment unit are: WHKB(FM), Houghton, MI (Facility ID No. 27690); WOLV(FM), Houghton, MI, (Facility ID No. 65673); and WCCY(AM), Houghton, MI (Facility ID No. 65672)

IV. RECRUITMENT

To ensure that information concerning each full-time vacancy is widely disseminated, we propose to use the following list of recruitment sources consistent with the requirements of 47 C.F.R. Section 73.2080:

See attachment

FCC NOTICE REQUIRED BY THE PAPERWORK REDUCTION ACT

We have estimated that each response to this collection of information will take one (1) hour. Our estimate includes the time to read the instructions, look through existing records, gather and maintain required data, and actually complete and review the form or response. If you have any comments on this estimate, or on how we can improve the collection and reduce the burden it causes you, please write the Federal Communications Commission, AMD-PER, Paperwork Reduction Project (3060-0113), Washington, D. C. 20554. We will also accept your comments via the Internet if you send them to pra@fcc.gov. Remember - you are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid OMB control number or if we fail to provide you with this notice. This collection has been assigned an OMB control number of 3060-0113.

THE FOREGOING NOTICE IS REQUIRED BY THE PAPERWORK REDUCTION ACT OF 1995, P.L. 104-13, OCTOBER 1, 1995, 44 U.S.C. 3507.

Outreach Efforts

Queen Bee's Knees LLC (“QBK”) conducts a broad and inclusive outreach effort that includes all local resources in the development and execution of the company’s equal employment opportunity program. QBK has a Director of Talent and Team Development to help advance these efforts, which include assistance in the areas of new hire education, manager training and EEO assessment.

New Hire Education. QBK explains its employment policies spelled out in the employee handbook to each new employee. The employee handbook discusses the company’s employment policies in their entirety, including the company’s specific equal opportunity employment policy. The policy prohibits discrimination in employment opportunities or practices based on race, color, religion, sex, national origin, age, disability, or any other characteristic protected by law. The employee is required to review the employee handbook and sign an acknowledgment that they have read the handbook. QBK is also willing to provide reasonable accommodation for individuals with known disabilities. Employees with questions or concerns may contact their human resources department, immediate supervisor, department head, or the general manager. Anyone found to be engaging in any type of unlawful discrimination will be subject to disciplinary action, up to and including termination of employment.

Manager Training. Senior management holds regular one-on-one meetings with department heads of the stations. The employment practices and benefits of the stations are discussed from time to time during these meetings. Senior management of the licensee meets routinely through the year to discuss operations at the stations. As part of these meetings, senior management would review employee benefits, seniority practices, promotions, and selection techniques to make sure that it is competitive with the marketplace and industry standards. In addition to compliance with federal, state, and local laws, such a review has the additional benefit of ensuring that QBK attracts the best and the brightest in the industry to work at the stations, while also ensuring a diverse staff reflective of the community. Our new hire training includes a comprehensive review of our policies. New hires are required to review, and to certify that they have reviewed, all relevant policy materials.

EEO Assessment. QBK periodically reviews its EEO policies to provide the best practice advice on dealing with potential EEO issues. These issues include, but are not limited to, claims of discrimination, sexual harassment, and unfair employment practices. The human resource department provides employees and managers with guidance on how to best handle certain EEO issues (as determined by the industry’s “best practice” standards) and assists in investigations of possible EEO infractions as needed. Each hiring manager is responsible to propose broad reach outlets for posting openings.

Senior management of QBK periodically conducts self-assessment of its EEO public file reports and supporting documentation to make sure that the company undertakes the most comprehensive and effective manner for disseminating job opening for full-time positions and outreach initiatives. In this regard, the EEO Recruiter List for each Public File Report is reviewed on a regular basis and updated as needed (add new contacts, update addresses, QBK.). The EEO Recruiter List is comprehensive and reaches the community of license and beyond.